PRIVACY POLICY

CATHOLIC SCHOOLS and CATHOLIC EDUCATION OFFICE
(ARCHDIOCESE OF ADELAIDE)

VISION

Catherine McAuley School is a Catholic Faith community which promotes and celebrates excellence in education.

A spirit of reconciliation is encouraged through our experience of faith, growth and unity.

We endeavour to prepare children for a life that is lived in justice, dignity and mutual respect.

“Honour everyone: love the family of believers”.

(1 Peter 2:17)
1. **PURPOSE**

Catholic Schools and the Catholic Education Office in the Archdiocese of Adelaide are bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This policy sets out how Catholic Schools and the Catholic Education Office in the Archdiocese of Adelaide use and manage the personal information provided to or collected by them.

Catholic Schools and the Catholic Education Office in the Archdiocese of Adelaide may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to schools' operations and practices and to make sure it remains appropriate to the changing school environment.

2. **SCOPE**

This Policy applies to the Catholic Education Office Adelaide and the Catholic schools in the Archdiocese of Adelaide it administers, the legal entity for which is the Catholic Church Endowment Society Inc.

3. **DEFINITIONS**

   ‘the school or CEO’ includes the Catholic Education Office Adelaide and the Catholic schools it administers, as well as sites on which staff or others engaged in duties or activities such as excursions or conference attendance sanctioned by their School or CEO.

   ‘Staff’ means staff employed by any Diocesan Catholic School or Catholic Education Office in the Archdiocese of Adelaide.
4. POLICY

4.1 What kinds of personal information does the school or CEO collect and how does it collect it?

The type of information the school or CEO collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parents and/or guardians (Parents) before, during and after the course of a student's enrolment at the school or CEO;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the school or CEO.

4.1.1 Personal Information you provide: the school or CEO will generally collect personal information held about an individual by way of forms filled out by Parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and students provide personal information.

4.1.2 Personal Information provided by other people: In some circumstances the school or CEO may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another school.

4.1.3 Exception in relation to employee records: Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the school or CEO treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the school or CEO and the employee.

4.2 How will the school or CEO use the personal information you provide?

The school or CEO will use personal information it collects from you for the primary purpose of collection, and for such other secondary
purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

4.3 **Students and Parents:** In relation to personal information of students and Parents, the school or CEO primary purpose of collection is to enable the school or CEO to provide schooling for the student. This includes satisfying the needs of Parents, the needs of the student and the needs of the school or CEO and the school throughout the whole period the student is enrolled at the school.

The purposes for which the school or CEO uses personal information of students and Parents include:

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after students’ educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the school; and
- to contribute to aggregated data that the school or CEO may require from time to time to meet their reporting, planning, contract and funding responsibilities on behalf of Schools;
- to satisfy the school’s or CEO’s legal obligations and allow the school or CEO to discharge its duty of care.

In some cases where the school or CEO requests personal information about a student or Parent, if the information requested is not obtained, the school or CEO may not be able to meet its legal obligations or to enable a quality learning environment for students.

4.4 **Job applicants, staff members and contractors:** In relation to personal information of job applicants, staff members and contractors, the school or CEO primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the school or CEO uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking funds and marketing for the school or CEO
- to contribute to aggregated data that the school or CEO uses to meet its reporting, planning, contract and funding responsibilities;
- to enable the school or CEO to maintain necessary staff information for entitlements including long service leave, maternity leave, workers compensation and other necessary industrial or employment purposes, and for accreditation and funding purposes.
- to satisfy the school or CEO legal obligations, for example, in relation to child protection legislation.

4.5 **Volunteers:** the school or CEO also obtains personal information about volunteers who assist the school or CEO in its functions or conduct associated activities, such as to enable the school or CEO and the volunteers to work together.

4.6 **Marketing and fundraising:** the school or CEO treats marketing and seeking donations for the future growth and development of the school or CEO as an important part of ensuring that the school or CEO continues to enable a quality learning environment in schools in which both students and staff thrive. Personal information held by the school or CEO may be disclosed to an organisation that assists in the school or CEO fundraising.

Parents, staff, contractors and other members of the wider community may from time to time receive fundraising information. School or CEO publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

4.7 **Exception in relation to related schools:** The Privacy Act allows each school, being legally related to each of the other schools conducted by the school or CEO to share personal (but not sensitive) information with other schools conducted by the school or CEO. Other schools may then only use this personal information for the purpose for which it was originally collected by the school or CEO. This allows schools to
transfer information between them, for example, when a student transfers from one school to another school administered by the CEO.

4.8 To whom might the school or CEO disclose personal information?
The school or CEO may disclose personal information, including sensitive information, held about an individual to:

- a school operated by the Catholic Church Endowment Society (Archdiocese of Adelaide) or the Diocese of Port Pirie;
- a Catholic Education Office in South Australia
- government departments;
- the local Catholic parish;
- people providing services to the school or CEO;
- recipients of the school or CEO publications, such as newsletters and magazines;
- Parents;
- anyone you authorise the school or CEO to disclose information to; and
- anyone to whom we are required to disclose the information by law.

4.8.1 Sending information overseas: the school or CEO may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers which are situated outside Australia. However, the school or CEO will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

4.9 How does the school or CEO treat sensitive information?
In referring to 'sensitive information', the school or CEO means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.
Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

4.10 Management and security of personal information
The school or CEO staff are required to respect the confidentiality of students’ and Parents’ personal information and the privacy of individuals.

The school or CEO has in place steps to protect the personal information held from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

4.11 Access and correction of personal information
Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the school or CEO holds about them and to advise the school or CEO of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or update any personal information the school or CEO holds about you or your child, please contact the Executive Officer in writing.

The school or CEO may require you to verify your identity and specify what information you require. The school or CEO may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information
sought is extensive, the school or CEO will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

4.12 Consent and rights of access to the personal information of students

The school or CEO respects every Parent's right to make decisions concerning their child's education.

Generally, the school or CEO will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. The school or CEO will treat consent given by Parents as consent given on behalf of the student, and notice to Parents will act as notice given to the student.

As mentioned above, parents may seek access to personal information held by the school or CEO about them or their child by contacting the school Principal or CEO Privacy Officer. However, there will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the school or CEO duty of care to the student.

The school or CEO may, at its discretion, on the request of a student grant that student access to information held by the school or CEO about them, or allow a student to give or withhold consent to the use of their personal information, independently of their Parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

4.13 Enquiries

If you would like further information about the way the school or CEO manages the personal information it holds please contact the school Principal or the CEO Privacy Officer.
5. **CONSEQUENCES OF A BREACH**

If you wish to complain that you believe the school or CEO has breached the Australian Privacy Principles, please contact the school Principal or CEO Privacy Officer (ph. 08 8301 6600). The school or CEO will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made.

6. **RELATED POLICIES and/or PROCEDURES**

This Policy is to be read in conjunction with, and is additional to, any other relevant South Australian Commission for Catholic Schools (SACCS), school or CEO Policy, Procedure or Guideline. All Staff are required to comply with the provisions of any such document, including the following:

- SACCS / CMS Code of Conduct
- SACCS / CMS Charter for Staff
- SACCS / CMS Information and Communications Technology (ICT) Policy

7. **RELATED DOCUMENTS/LINKS**

**Privacy Amendment (Enhancing Privacy Protection) Bill 2012**
www.comlaw.gov.au/privacy_amendments

September 2013
CESA privacy collection

**Office of the Federal Privacy Commissioner**
www.privacy.gov.au

Privacy Collection - Policy and collection notice templates for schools, privacy information for enrolments, employees, volunteers, contractors, etc.
CESA privacy collection
**DATE FOR REVIEW**

**Reviewed:** 5 November 2014  
**Next Review:** 2019

*Please Note:* This Policy is informed by the ‘SACCS Privacy Policy 2014’ and is due for revision by SACCS in May 2019.

The school will follow any updates (prior to the next scheduled revision date by the school) as per SACCS advice.

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<td>1 May 2019</td>
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